BPL is a bad idea for several reasons, and continued deployment of this technology should be either stopped, or put on frequencies that don't have the EMI interference issues that the present system uses. . 1) The spectrum currently used is well known for long distance propagation at low power levels. BPL will pollute this, the most choice spectrum in existence, for long distance RF communications. Studies done by the NTIA and the ARRL have shown that BPL systems do in fact radiate broad spectrum noise, contrary to the information being circulated by BPL proponents. 2) There are several better ways of accomplishing the same purpose as BPL would accomplish, without the many inherent flaws of BPL. These methods are already well developed, in use, offer better bandwidth and performance than BPL, and are cost competitive with BPL. The fact that expensive repeaters, at typically less than 1 mile intervals, are needed to implement BPL, makes shielded cable, fiber optic cable and UHF/Microwave wireless LANs much more attractive than BPL. This is particularly true when taken in the light of using existing utility company rights of way to implement these other systems . 3) The use of 1.7 to 80 MHz as currently used with BPL is in itself a bandwidth limiting situation. The amount of information, and the rate at which it can be sent is proportional to the carrier frequencies available. Going to high UHF or microwave frequencies for BPL, or a similar replacement technology would greatly enhance both bandwidth and system speed, while avoiding the pollution of long distance capable frequencies. 4) Using house wiring is a poor method of distributing data throughout the house. Using house wiring to send information is not a new technology, it has been used for a variety of purposes in the past, all of which must contend with the noise generated by arcing brushes in electric motors, Triac operated lamp dimmers, and a whole host of other line noise sources. High speed data would be subject to these same problems, as well as being a noise source to other line operated devices in itself. 5) A very rapid response, effective method of interference mitigation needs to be put into place. Current BPL frequencies, radiated from power lines, fall into spectrum used by the US Military, Homeland Security, Federal Law enforcement, State and Local government, International short wave broadcast, Amateur, Citizens Band, Marine, and a whole host of others. To cause interference to these entities endangers life and property, as well as making everyday operations either difficult or impossible. This is not tolerable. It is interesting to note that a Progress Energy BPL system already in use, has encountered an interference problem in the upper end of the 20M Amateur Band, that the local providers have so far, not taken a serious interest in mitigating. Is this a developing trend? If so, does the FCC intend to step in and assert it's authority and force compliance? If not, then this systems' deployment "as is" is just plain unworkable. 6) Considering BPL as a part 15 entity, then modifying the part 15 rules to accommodate it is also a built in trap. Previous and modified part 15 rules put some groups of consumers at odds with licensed services over interference issues. So far this has been workable. If BPL becomes real prolific, the encounters between uninformed, part 15 BPL users, and licensed services over interference issues is certain to become much more widespread than ever thought of before. I can just see a bunch of "vigilante" homeowners getting in an ugly situation with an unsuspecting Ham or CB operator, over an issue of "their rights"!

In Summary: It would be better to stop this juggernaught now, but if it must go on, it needs serious modification to better integrate with existing users and entities who will be affected by it.

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